

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
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UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(18 U.S.C. § 1017)

KARA STERNQUIST,

22-MJ-01005

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

DAVID SCHWARTZ, being duly sworn, deposes and states that he is a Postal Inspector with the United States Postal Inspection Service, duly appointed according to law and acting as such.

In or about and between December 1, 2021 and September 15, 2022, within the Eastern District of New York and elsewhere, the defendant KARA STERNQUIST, with wrongful and fraudulent intent, did use, buy, and procure an instrument, commission, document and paper, to which and upon which the seal of a department and agency of the United States had been fraudulently and wrongfully affixed, with knowledge of such instrument's, commission's, document's and paper's fraudulent character, to wit: badges and credentials for multiple federal law enforcement agencies.

(Title 18, United States Code, Section 1017)

The source of your deponent's information and the grounds for his belief are as follows:¹

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

1. I am a Postal Inspector with the United States Postal Inspection Service and have been since November 2019. In addition, I have been a Task Force Officer with the United States Department of Homeland Security, Homeland Security Investigations (“HSI”) since May 2021. In that capacity, I am assigned to HSI’s Dark Web and Cryptocurrency Task Force. I previously served as a Special Agent of the United States Secret Service for over three years. During my time as a federal law enforcement officer, I have been involved in the investigation of numerous cases involving the illegal use and transmittal through the United States mail (and other interstate carriers) of fraudulent identification documents.

2. The United States Postal Inspection Service; the United States Department of Homeland Security, Homeland Securities Investigations; and the United States Attorney’s Office for the Eastern District of New York have been conducting an investigation of Kara Sternquist concerning the purchase and delivery of fraudulent badges and identification documents for multiple United States law enforcement agencies. The evidence generated to date indicates that Sternquist had these badges and identification documents shipped to her at an apartment in Manhattan, New York (the “Sternquist Address”). The investigation has also produced evidence that Sternquist, who has a prior felony conviction, as detailed below, has purchased parts and equipment related to firearms, including parts and equipment that, based on my knowledge, training, and experience, are used in the creation of personally made firearms, commonly known as “ghost guns.” These firearms-related parts and equipment have also been shipped to Sternquist to herself at an apartment in Manhattan.

3. On January 14, 2022, officers with the United States Customs and Border Protection (“CBP”) inspected a package that had arrived at the international mail facility maintained by the United States Postal Service (the “International Mail Facility”) at John F.

Kennedy International Airport (“JFK Airport”). The package was inspected by CBP as part of an enforcement examination of mail arriving from China. The package was addressed to “Kara Sternquist” at her residence, the “Sternquist Address”. The shipper was identified on the package as “Lele Li” with an address in the Guangdong province of China. The package contained a gold badge with gold lettering identifying it as a United States Coast Guard Special Agent badge. The package also contained another gold badge with gold lettering identifying it as a Department of State Diplomatic Security Service Special Agent badge. I understand from discussions with other federal law enforcement officers that neither the Coast Guard badge nor the Department of State badge are authentic badges that were actually issued by those agencies. Upon discovery of the package’s contents, CBP officers seized the badges, and the package was not delivered. A seizure notice was generated by CBP on March 7, 2022 and mailed to the Sternquist Address. The notice advised that CBP had seized property – described as two fraudulent badges – at JFK Airport on January 14, 2022. The notice further stated that the property was subject to forfeiture and gave the recipient options as to how to proceed with the forfeiture process. The notice was returned to CBP on March 15, 2022 by the U.S. Postal Service as returned to sender.

4. On June 26, 2022, CBP officers inspected another package that had arrived at the International Mail Facility at JFK Airport. The package was addressed to “Kara Sternquist” at the Sternquist Address. The shipper was again identified as “Lele Li” with an address in the Guangdong province of China. The package contained a gold badge with gold lettering identifying it as a Department of State Diplomatic Security Service Special Agent badge. This package was inspected as part of an enforcement examination of mail arriving from China. Upon discovery of the package’s contents, CBP officers seized the badge, and the package was not

delivered. A seizure notice was generated by CBP on July 15, 2022 and mailed to the Sternquist Address. The notice advised that the CBP had seized property – described as a fraudulent badge – at JFK Airport on June 26, 2022. The notice further stated that the property was subject to forfeiture and gave the recipient options as to how proceed with the forfeiture process.

5. On August 22, 2022, CBP officials inspected a third package that had arrived at the International Mail Facility at JFK Airport. The package was addressed to “Kara Sternquist” at the Sternquist Address. The shipper was again identified on the package as “Lele Li” with an address in the Guangdong province of China. The package contained a gold badge with blue lettering identifying it as a badge for the United States Marshals Service. I understand from discussions with officials with the United States Marshals Service that the badge contained in the package is not authentic, but rather a replica of an official Marshals badge. Upon discovery of the August 22, 2022 package’s contents, CBP officers seized the badge, and the package was not delivered.

6. A review of records maintained by the United States Postal Service and the United States Department of Homeland Security identified at least one other similar seizure of fraudulent credentials for a United States law enforcement agency destined for the Sternquist Address. Specifically, on June 28, 2022, CBP officers inspected a package that had arrived at the cargo facility maintained by the International Bonded Couriers, Inc. at JFK Airport. The package was addressed to Kara Sternquist at the Sternquist Address. The shipper was identified as “Quantum Solutions Hong Kong L” at an address that was located in the Hong Kong Special Administrative Region of China.² The contents of this package consisted of what purported to

² The package also contained a second label suggesting that the package had been shipped from an address in Kentucky. Based on my knowledge, training, and experience, and

be official credentials identifying “Kara Withersea” as a Special Agent with the United States Environmental Protection Agency (“EPA”). The credentials featured a photograph purporting to be that of “Kara Withersea” and depicting what appeared to be a Caucasian female with long, reddish hair. The credentials also featured images purporting to be the official seal of the EPA. I understand from discussions with officials at the EPA that there is no such special agent employed by the EPA and that the credentials contained in the package are not authentic EPA credentials. This package was also not delivered.

7. A search of information contained in law enforcement databases identified an individual named Kara Sternquist, who, according to the information in the databases, is presently residing at the Sternquist Address. Sternquist was arrested by officers of the New York City Police Department (“NYPD”) on or about June 19, 2021.³ During processing by the NYPD, Sternquist identified the Sternquist Address as her address. I have reviewed photographs of Kara Sternquist on file with the NYPD from that arrest and, based on that review, I believe that the photograph associated with the identity of “Special Agent Withersea” in the phony EPA credentials described above in fact depicts Sternquist.

8. As mentioned above, in addition to purchasing these counterfeit law enforcement credentials and badges, Kara Sternquist has, either under her own name or an alias, also purchased parts and equipment related to firearms, including parts and equipment that are commonly used in the creation of so-called “ghost guns” and had those items shipped to the

discussions with other federal agents, I believe that the fact that the package was intercepted at the cargo facility at JFK airport indicates that the package was in fact shipped from overseas.

³ Sternquist was charged with criminal mischief in the second degree in violation of N.Y. Penal Law § 145.10. Publicly available information indicates that the case is still pending. See Case No. 10767-2021, New York State Supreme Court (Manhattan) – Criminal Term.

Sternquist Address. Sternquist, however, has a prior felony conviction. Specifically, Sternquist pleaded guilty in United States District Court for the Southern District of Ohio to producing a false identification document, in violation of 18 U.S.C. §§ 1028(a)(1), (b)(1)(A). (07-CR-033 (WHR), S.D. Ohio). A judgment imposing a sentence of twelve months' incarceration issued against Sternquist on July 23, 2007. The judgment names the defendant as Michael J. Sternquist, but, from my review of the court records and information contained in law enforcement databases, Michael J. Sternquist has the same date of birth and Social Security number as Kara Sternquist, who presently resides at the Sternquist Address. From my review of law enforcement records, and based on my knowledge, training, and experience, I understand that at the time of the 2007 judgment, Sternquist identified as a male and went by the name of "Michael J. Sternquist"; I understand that Sternquist currently identifies as female and goes by the name "Kara Sternquist."

9. As part of the guilty plea in the Southern District of Ohio, Sternquist agreed to a statement of facts that admitted the following in relevant part:

At [a] residence, MICHAEL STERNQUIST manufactured and produced at least 15 identification cards and authentication features, including, among others, a counterfeit United States Department of Defense identification and counterfeit driver licenses from the states of Illinois, California, and Texas. In order to manufacture the identification cards, MICHAEL STERNQUIST used authentication features and equipment which he had purchased for that purpose using the internet, primarily the e-Bay website. MICHAEL STERNQUIST used official names, seals and other authentication features to make the cards appear legitimate. MICHAEL STERNQUIST received the authentication features and equipment designed and suited for making the identification cards through the United States Postal Service or private or commercial interstate carriers at addresses he had provided the seller over the internet.⁴

⁴ Notably, Sternquist pleaded guilty to an information, and the docket reflects that

10. As part of the investigation, I have reviewed records obtained from a company called “Sally’s Cop Shop.” Those records show over twenty purchases of items related to law enforcement credentials by a purchaser identified as “Kara Sternquist” during the period from approximately July 2019 through July 2022. The purchased items include the following: “credential case IRS”; “credential case with gold DHS imprint”; and “ATF trifold badge case.” In each case the purchaser listed the Sternquist Address as the address to which the items were to be shipped. The two most recent purchases occurred on July 28, 2022. The records indicate that the purchaser used the email address kara.sternquist@gmail.com. The records also appear to show that the purchases were made online using the internet.

11. I have also reviewed records obtained from certain sellers of parts and equipment for firearms. The sellers include ABC Rifle, Dead Foot Arms LLC, Arms Unlimited, Omaha Outdoors, and Lone Wolf Firearms. Those records show purchases from an individual identified as Kara Sternquist, using the email address quistproquo@gmail.com. The purchases generally include pieces of equipment that, based on my knowledge, training, and experience, can be used either to assemble firearms or to augment the capability of an existing firearm. For example, the records show that Kara Sternquist purchased a total of 4 ambidextrous magazine releases designed to be used with AR-15 rifles from Arms Unlimited – one of the purchases (for 2 of the magazine releases) occurred on July 10, 2022, and the other purchase (for the other 2 magazine releases) occurred in December 2021. Similarly, the records show that Kara Sternquist twice purchased “polished aluminum bolt carrier groups” for use with an AR-15 rifle

Sternquist was advised of her constitutional right to require the government to obtain the charge to which she pleaded guilty by indictment issued by a grand jury and elected to waive that right, thereby permitting the government to proceed by information.

from ABC rifle. Based on my knowledge, training, and experience, an aluminum bolt carrier group is a piece of equipment that houses many of the internal working mechanisms of the rifle including the firing pin – in my experience, only one bolt carrier group is used per rifle. One of the purchases of a bolt carrier group occurred in June 2022; the other in July 2022.

12. In total, the records show that Kara Sternquist purchased approximately ten pieces of equipment related to firearms during the period from November 2021 through July 2022. With respect to each purchase, Sternquist listed the Sternquist Address as the shipping address. From my review of the records, at least five of these purchases were associated with tracking information that, when queried, reported a confirmed delivery to the Sternquist Address. In addition, from my review of records maintained by the U.S. Postal Service, I know that all of the companies identified above have at various points shipped packages to the Sternquist Address which were successfully delivered (though the records do not identify the specific contents of those packages).

13. In addition to these ten purchases, the records also show approximately four other purchases of firearms-related equipment by an individual identified as “Cara Sandiego,” who also listed the quistproquo@gmail.com email address in connection with the purchases. I have conducted an open-source review of publicly available social media information and identified accounts in the name of “Cara Sandiego” that feature pictures of Kara Sternquist as the account user.⁵ The purchases made by Cara Sandiego were also set for delivery to the Sternquist

⁵ One of these accounts on Facebook shows the user “liked” an organization called “Armed Equality,” which, on the Facebook page for the entity, features multiple anti-law-enforcement posts, including a cartoon depicting a character announcing that “the cops and government are now Nazis,” to which another character responds, “then get a gun to defend yourself instead of trying to ban them, you fucking walnut.”

Address. All of the purchases attributed to Cara Sandiego were made in May and June 2022.

Among other pieces of equipment, Cara Sandiego also purchased one frame-completion kit and one frame replacement tool and adhesive kit, both of which, based on my knowledge, training, and experience, are commonly used in the construction of so-called “ghost guns.” Specifically, these kits can be used in conjunction with other parts (i.e., an 80% complete frame) to construct a functioning firearm.⁶

14. CBP officers have also intercepted at least one international package bound for the Sternquist Address that contained firearms-related equipment. Specifically, on July 7, 2022, CBP officers inspected a package that had arrived at the Seko cargo facility at JFK. The package was addressed to “Kara Sternquist” at the Sternquist Address. The shipper was identified on the package as “Tse Suet Ho” with an address in the Hong Kong Special Administrative Region of China. The package contained three rifle sights (an “L85A3 Front Rifle sight,” an “L85A3 Rear Rifle sight,” and an “HK4116 Rear Rifle sight”). Based on my knowledge, training, and experience, these sights can be affixed to rifles to enhance the targeting capabilities of the firearms.

15. On September 14, 2022, the Honorable Stewart D. Aaron, United States Magistrate Judge for the U.S. District Court for the Southern District of New York issued a search warrant for the Sternquist Address. I participated in the execution of that warrant earlier today. During the course of searching the Sternquist Address, agents seized approximately 52

⁶ The records also show two purchases of firearms-related equipment by an individual identified as “Theo Ester,” including an 80% frame. The quistproquo@gmail.com address was also used in connection with the purchases. These purchases were made in May 22, 2022, with a delivery address located in Missouri.

counterfeit badges, including one for the EPA – many of which depict the seals of the relevant agencies, as shown in the photograph below:



In addition, the agents seized approximately 10 counterfeit seals of the United States Bureau of Alcohol, Tobacco, Firearms and Explosives (“ATF”) that appear to be sized for use in ATF credentials. The agents also seized one “raid jacket” purporting to be for the United States Marshals Service. The agents also seized at least two common access cards for the United States Navy in the name of Kara Sternquist and depicting her photograph.

16. In addition to the counterfeit badges and credentials, agents also recovered the following items:

- At least 10 firearms, including at least two of which appear to be fully automatic;

- Multiple firearms suppressors;
- Over 20 passports in the names of individuals other than the defendant; and
- At least 144 credit or debit cards with at least 100 pieces of photo identification corresponding to the cards.

WHEREFORE, your deponent respectfully requests that the defendant KARA STERNQUIST be dealt with according to law.

S/ David Schwartz

DAVID SCHWARTZ
Postal Inspector,
United States Postal Inspection Service

Sworn to before me this
15 day of September, 2022

S/ Roanne Mann

THE HONORABLE ROANNE L. MANN
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK